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1/11/02

PLAINTIFF'S MOTION TO COMPEL DISCOVERY
RESPONSES ADDRESSED TO DEFENDANT J & J INVESTMENT
MANAGEMENT COMPANY

1-1-CV-785

FILED
JAN 10 2002

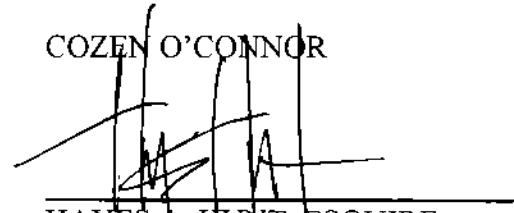
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MARY E. DUNN
Per Deputy Clerk

EXHIBIT "A".	Correspondence to Defendant 10/3/01 from Plaintiff
EXHIBIT "B".	Correspondence to Defendant 12/11/01 from Plaintiff
EXHIBIT "C".	Correspondence to Defendant 1/2/02 from Plaintiff
EXHIBIT "D".	Correspondence to Defendant 7/27/01 from Plaintiff

Respectfully submitted,

COZEN O'CONNOR



HAYES A. HUNT, ESQUIRE

1900 Market Street

Philadelphia, PA 19103

(215) 665-4734

ATTORNEY FOR PLAINTIFF

Dated: 1/7/02

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Hayes A. Hunt

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October 3, 2001

Martin A. Durkin, Jr., Esquire
Durkin & Associates, P.C.
One Penn Center, Suite 1520
1617 JFK Boulevard
Philadelphia, PA 19103

**Re: Ohio Casualty Group, as subrogee of Eric Staub v. J & J
Investment Management Company
Our File No. 104265**

Dear Mr. Durkin:

As of this date, I have not received an answer to Plaintiff's outstanding Discovery Requests. I would like to schedule the deposition of John W. Gimbalvo in the near future. As you know, Judge Kane has given us a narrow window to complete fact discovery within the next three (3) months.

I hope to receive your responses to Plaintiff's Interrogatories and Request for Production of Documents in the near future.

Please contact me so we can discuss available dates and location for the deposition of Mr. John Gimbalvo.

Exhibit A

Martin A. Durkin, Jr., Esquire

September 10, 2001

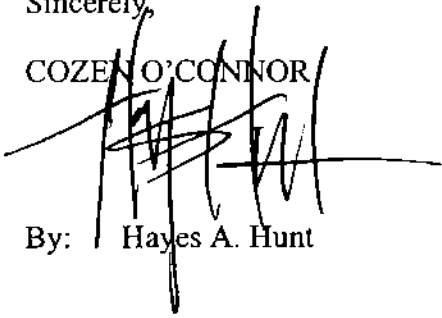
Page 2

I look forward to hearing from you.

Thank you for your attention and courtesy in this matter.

Sincerely,

COZEN O'CONNOR

By:  Hayes A. Hunt

HAH/cll

cc: James Malloy

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December 11, 2001

Martin A. Durkin, Jr., Esquire
Durkin & Associates, P.C.
One Penn Center, Suite 1520
1617 JFK Boulevard
Philadelphia, PA 19103

**Re: Ohio Casualty Group, as subrogee of Eric Staub v. J & J
Investment Management Company
No. CV01-0785
Our File No. 104265
Discovery Due**

Dear Marty:

On November 21, 2001, you explained that your answers to our Interrogatories and Request for Production and Documents were completed, however, your responses were not sent to my office. Plaintiff's First Set of Interrogatories and Request for Production of Documents were served on July 27, 2001. To date, I have not received your responses and, as you know, the close of fact discovery is January 25, 2002. I expect to receive your completed answers to the above-mentioned discovery within the next seven (7) days.

I expect to schedule the depositions of John Giambalvo and Al Budrow within the next thirty (30) days.

Exhibit B

Martin A. Durkin, Jr., Esquire

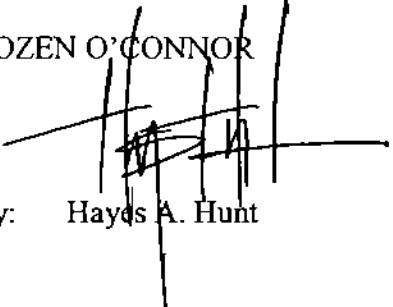
December 11, 2001

Page 2

Thank you for your attention and courtesy in this matter.

Sincerely,

COZEN O'CONNOR

By:  Hayes A. Hunt

HAH/cil

cc: James Malloy, Esquire

bcc: Thomas Hill

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January 2, 2002

VIA FACSIMILE AND HAND DELIVERY

Martin A. Durkin, Jr., Esquire
Durkin & Associates, P.C.
One Penn Center, Suite 1520
1617 JFK Boulevard
Philadelphia, PA 19103

**Re: Ohio Casualty Group, as subrogee of Eric Staub v. J & J
Investment Management Company
No. CV01-0785
Our File No. 104265
Discovery Due**

Dear Marty:

As we discussed on December 28, 2001, you assured me that your discovery responses would be provided on Monday, December 31, 2001. Please forward the aforementioned discovery responses within the next three (3) days or I will have no other recourse but to file a Motion to Compel Discovery and seek judicial intervention to resolve this matter. My client will seek reimbursement for all attorney's fees associated with the filing of a Motion to Compel Discovery. The aforesaid discovery requests have gone unanswered since July 27, 2001.

As you know, Judge Kane has ordered that fact discovery be completed by January 25, 2002. In that regard, I ask that you immediately provide your available dates for scheduling depositions. Also, please let me know the dates, prior to January 25, 2002, that Mr. John Giambalvo is available to be deposed.

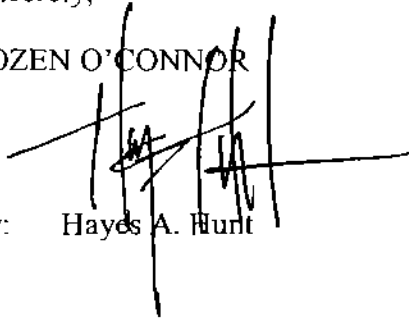
Exhibit C

Martin A. Durkin, Jr., Esquire
January 2, 2002
Page 2

Thank you for your attention and courtesy in this matter. I trust that I will receive your discovery responses within the next three (3) days.

Sincerely,

COZEN O'CONNOR

By:  Hayes A. Hunt

HAH/cll

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July 27, 2001

Martin A. Durkin, Jr., Esquire
Durkin & Associates, P.C.
One Penn Center, Suite 1520
1617 JFK Boulevard
Philadelphia, PA 19103

**Re: Ohio Casualty Group, as subrogee of Eric Staub
v. J & J Investment Management Company
No. CV01-0785
Our File No. 104265**

Dear Mr. Durkin:

Enclosed please find Plaintiff's First Set of Interrogatories and Request for Production of Documents addressed to Defendant, J & J Investment Company.

Thank you for your attention and courtesy in this matter.

Sincerely,

COZEN O'CONNOR

BY: Hayes A. Hunt

HAH/cll
Enclosures
PHILA\1472595\ 104265.000

Exhibit D